

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND DIVISION**

FINALROD IP, LLC AND R2R AND D, LLC
d/b/a SUPEROD,

Plaintiffs/Counter-Defendants,

V.

JOHN CRANE, INC. AND JOHN CRANE
PRODUCTION SOLUTIONS, INC., ENDURANCE
LIFT SOLUTIONS, INC.

Defendants/Counter-Plaintiffs.

CIVIL ACTION NO. 7:15-cv-00097

JURY TRIAL DEMANDED

**Plaintiffs/Counter-Defendants' UNOPPOSED Motion for Leave to Exceed Page Limit for
Response to Defendants' Motion to Exclude the Opinions and Testimony of Chris
Hetmaniak**

Plaintiffs/Counter-Defendants Finalrod IP, LLC and R2R and D, LLC (“Plaintiffs” or “Superod”) (collectively “Plaintiffs”) through counsel of record, pursuant to Local Rule CV-7b, hereby file this Unopposed Motion for Leave to Exceed the Page Limit for Plaintiffs’ Response to Defendants’ Motion to Exclude the Opinions and Testimony of Chris Hetmaniak [ECF Doc. No. 293]. In support hereof, Plaintiffs show the following:

This Court, on November 8, 2019, entered an Order granting Plaintiffs an additional eight (8) pages for their Response to Defendants’ Motion to Exclude the Opinions and Testimony of Chris Hetmaniak. *See* Text Order Granting [293] Motion entered November 8, 2019.

Plaintiffs now move this Court for leave to exceed the ten page limit for its Response by 12 pages. Plaintiffs are filing the Motion under seal, contemporaneous with this request to exceed the page limits.

Plaintiffs are mindful of the Court's limited time and resources; however, given the importance of the proffered evidence, Plaintiffs believe the additional pages are necessary in order to fully brief the Court and provide a complete discussion of the factual and legal issues and so that justice may be served.

Plaintiffs' Response to Defendants' Motion to Exclude the Opinions and Testimony of Chris Hetmaniak is due to be filed with this Court on today's date, November 22, 2019.

Plaintiffs are contemporaneously filing the proposed Response under separate cover, and under seal.

Plaintiffs have conferred with Defendants, who do not oppose this motion regarding page limits.

Plaintiffs respectfully request that they be granted leave to exceed the Court's page limit as requested herein.

Prayer

WHEREFORE, Plaintiffs Finalrod IP, LLC and R2R and D, LLC d/b/a Superod respectfully request that this Court grant this Motion and allow Plaintiffs to file their Response to Defendants' Motion to Exclude the Opinions and Testimony of Chris Hetmaniak [ECF Doc. No. 293] in excess of page limits.

DATED: November 22, 2019

Respectfully submitted,

/s/ Terry B. Joseph
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**Attorneys for
Plaintiffs/Counter-Defendants,
Finalrod IP, LLC and R2R and D, LLC**

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been filed on this 22nd day of November, 2019, pursuant to the electronic filing requirements of the United States District Court for the Western District of Texas, which provide for service on counsel of record in accordance with the electronic filing protocols in place.

/s/ Terry B. Joseph
Terry Joseph

CERTIFICATE OF CONFERENCE

I hereby certify that the parties have complied with Local Rule CV-7(i)'s meet and confer requirement. Defendant/Counter-Plaintiffs' counsel are **unopposed** to this motion.

/s/ Terry B. Joseph
Terry Joseph